

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

**3:19-cr-00356-MO**

**v.**

**SUPERSEDING INDICTMENT**

**OSCAR ADRIAN MARQUEZ,**

**18 U.S.C. §§ 2261A(1) & 2261(A)(2)**

**18 U.S.C. §§ 2262(a)(1) & 2265A**

**Defendant.**

**18 U.S.C. § 2266(5)**

**THE GRAND JURY CHARGES:**

**COUNT 1**

**(Cyberstalking)**

**(18 U.S.C. § 2261A(2))**

Between on or about October 17, 2014, and on or about July 29, 2019, in the District of New Mexico and elsewhere, including the District of Oregon, defendant **OSCAR ADRIAN MARQUEZ**, with the intent to injure, harass, and intimidate, did use an interactive computer service and electronic communication service and electronic communication system of interstate commerce, to engage in a course of conduct that placed Adult Victim 1 ("AV1") in reasonable

fear of death and serious bodily injury, and caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to AV1;

In violation of Title 18, United States Code, Section 2261A(2).

**COUNT 2**  
**(Stalking)**  
**(18 U.S.C. § 2261A(1))**

Between January 1, 2019, and on or about July 29, 2019, in the District of New Mexico and elsewhere, including the District of Oregon, defendant **OSCAR ADRIAN MARQUEZ**, traveled in interstate commerce with the intent to injure, harass, and intimidate, and place under surveillance with the intent to injure, harass, and intimidate, AV1 and, in the course and as a result of such travel, placed AV1 in reasonable fear of death and serious bodily injury, and caused, attempted to cause, and would reasonably be expected to cause, substantial emotional distress to AV1; during the offense, **OSCAR ADRIAN MARQUEZ** used a dangerous weapon, specifically: a replica Glock handgun capable of shooting BBs;

In violation of Title 18, United States Code, Section 2261A(1).

**COUNT 3**  
**(Interstate Violation of a Protection Order)**  
**(18 U.S.C. § 2262(a)(1))**

Between January 1, 2019, and on or about July 29, 2019, in the District of New Mexico and elsewhere, including the District of Oregon, defendant **OSCAR ADRIAN MARQUEZ**, traveled in interstate commerce with the intent to engage in conduct that would violate the portion of a protection order issued on October 17, 2014, in the Second Judicial District of Bernalillo County, New Mexico, that provided protection against violence, threats, and harassment against AV1, and prohibited **OSCAR ADRIAN MARQUEZ** from, among other

things: contacting and communicating with AV1, “repeatedly driving by” AV1’s residence, and  
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being within 100 yards of AV1's residence; and **OSCAR ADRIAN MARQUEZ** did subsequently engage in such conduct;

In violation of Title 18, United States Code, Section 2262(a)(1).

**COUNT 4**  
**(Interstate Violation of a Protection Order)**  
**(18 U.S.C. § 2262(a)(1))**

Between January 1, 2019, and on or about July 29, 2019, in the District of New Mexico elsewhere, including the District of Oregon, defendant **OSCAR ADRIAN MARQUEZ**, traveled in interstate commerce with the intent to engage in conduct that would violate the portion of a protection order issued on October 17, 2014, in the Second Judicial District of Bernalillo County, New Mexico, that provided protection against violence, threats, and harassment against Minor Victim 1 ("MV1"), and prohibited **OSCAR ADRIAN MARQUEZ** from, among other things: contacting and communicating with MV1, "repeatedly driving by" MV1's residence, and being within 100 yards of MV1's residence; and **OSCAR ADRIAN MARQUEZ** did subsequently engage in such conduct;

In violation of Title 18, United States Code, Section 2262(a)(1).

**COUNT 5**  
**(Interstate Violation of a Protection Order)**  
**(18 U.S.C. § 2262(a)(1))**

Between January 1, 2019, and on or about July 29, 2019, in the District of New Mexico and elsewhere, including the District of Oregon, defendant **OSCAR ADRIAN MARQUEZ**, traveled in interstate commerce with the intent to engage in conduct that would violate the portion of a protection order issued on October 17, 2014, in the Second Judicial District of Bernalillo County, New Mexico, that provided protection against violence, threats, and

harassment against Minor Victim 2 ("MV2"), and prohibited **OSCAR ADRIAN MARQUEZ**

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from, among other things: contacting and communicating with MV2, "repeatedly driving by" MV2's residence, and being within 100 yards of MV2's residence; and **OSCAR ADRIAN MARQUEZ** did subsequently engage in such conduct;

In violation of Title 18, United States Code, Section 2262(a)(1).

**ENHANCED PENALTY PROVISION**

Before on or about July 29, 2019, **OSCAR ADRIAN MARQUEZ** incurred at least one domestic violence or stalking offense in the State Courts of New Mexico, making him eligible for an enhanced term of imprisonment as provided in Title 18, United States Code, Section 2265A upon a conviction for Counts 1, 2, 3, 4, or 5 of this Superseding Indictment.


Dated: January 14, 2020.

A TRUE BILL.

 OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS  
United States Attorney

  
THOMAS S. RATCLIFFE, ILSB #6243708  
Assistant United States Attorney